

Keeping Up with the Past

Updating Guidance for Archeological Best Practices

The national archaeological program has changed the face and practice of archaeology in the U.S. It has resulted in a great increase in substantive knowledge, new research methods and management techniques, new career paths, and new organizations that provide research and preservation expertise.¹

The national archeology program is an important and effective enterprise that has changed the face of the profession. It is not, however, without challenges.

During the mid-1990s, critics both within and outside the profession raised questions about how public archeological programs were carried out in the United States. Critics asserted that implementation of laws, regulations, guidelines, and standards was inconsistent; that laws and regulations were applied inappropriately; that costs of conducting archeological investigations were too high and frequently provided little return on the expenditures; and that decisions frequently were made to expedite administrative procedures rather than for appropriate treatment of significant archeological properties.

The following statement by William Lipe and Charles Redman in the *SAA Bulletin* summarizes the situation:

Anyone who attended the May 1995 forum on “Restructuring American Archaeology” at the SAA annual meeting in Minneapolis or who has logged on recently to archaeologically oriented electronic mailing lists is keenly aware of the extent and intensity of the debates going on within the field of archaeology. And from outside our field, there have been criticisms of the federal role in archaeology and historic preservation from certain members of Congress, as well as from scat-

tered voices in the private sector, state and federal agencies, Indian tribes, and the larger historic preservation community.²

The profession responded to the critique in several ways. The Society for American Archaeology (SAA) and the Society of Professional Archeologists (SOPA) established a task force on Renewing Our National Archaeological Program. The first of five major issues identified as requiring immediate attention was “improving implementation of the National Historic Preservation Act,” including the Section 106 process. The 1997 report of the task force recommended the review of existing archeological guidance and development of new guidance, if needed.

In 1996, the archeological and historic preservation consultant community formally organized the American Cultural Resource Association (ACRA), a private organization that began advocating for cultural resources management in the bureaucratic and political arenas. The Advisory Council on Historic Preservation, National Conference of State Historic Preservation Officers (NCSHPO), and National Park Service (NPS) undertook reviews of existing practices. One outgrowth of these reviews is the project that is the subject of this article.

Over the last several years, the National Park Service has been involved in a series of meetings with several of these organizations and agencies and we have conducted workshops at professional conferences. In June 2000, the National Park Service, the Advisory Council, NCSHPO, and the Society for American Archaeology co-sponsored a workshop on Evaluating and Improving Federal Archeology Guidance that has led to this project.

A group of 30 highly experienced archeologists met in Washington, DC, for three days in

June 2000, and considered the basic needs for improving federal guidance on the practice of archeology. The participating archeologists represented federal and state agencies, private sector consulting firms, and academia. The group met as a whole initially and then split into separate panels on identification, evaluation, and treatment. The meeting ended with the whole group gathered together to discuss each panel's recommendations.

The working group accomplished the following tasks:

- reviewed existing written standards and guidelines;
- evaluated existing guidance to determine whether it is good enough;
- considered whether additional guidance would be helpful;
- identified the kind of guidance that would help; and
- recommended repackaging and distribution of existing, but under-utilized guidance.

What is Current Reality?

The situation as of June 2000 may be summarized as follows.

- In general, the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* provide good, basic guidance for identification and evaluation, but they are difficult to find and somewhat out of date. These standards and guidelines address only the documentation of archeological sites in considering treatment.
- The federal guidance on identification is adequate in many regards, but inaccessible.
- The basic federal guidance on evaluation is adequate in many regards, but requires a more comprehensive National Register bulletin on the evaluation and registration of archeological properties. There also are further needs for guidance.
- The federal guidance on treatment is neither adequate nor accessible. The need for federal guidance on treatment is critical, as there is relatively little guidance on treatments beyond data recovery and documentation through excavation.

What is Our Response?

Judging from the assessment of the working group, and the past few years of dissatisfaction, change is urgent. The National Park Service needs to make current guidance accessible and to

provide better guidance where necessary. The private sector, preservation organizations, academics, and state and federal agencies want this improved guidance.

Therefore, we have identified the following straightforward statement as our major goal related to improving and providing national archeological guidance:

Every archeologist, land manager, permit applicant, and interested citizen can find and use relevant and appropriate federal guidance, case studies, technical publications and other helpful information on the identification, evaluation, and treatment of archeological resources.

There are quite a few sub-goals under this major goal. First, there is guidance common to identification, evaluation, and treatment. A central component of the guidance project is improving accessibility of existing guidance documents. Therefore, federal archeology guidance should be accessible in that it is easy to find and easy to use. It should be sensible to non-archeologists who must implement or judge it. Because marketing is always a concern, relevant audiences will be informed about available guidance and encouraged to use it.

National guidance should be incorporated into agency handbooks to encourage consistency of practice. We intend to make useful and timely guidance available on the Internet, through the design and maintenance of a web site. This web-based clearinghouse of existing guidance will direct users to appropriate materials, whether electronic or in paper format. The bibliography of federal guidance and relevant web links will be updated regularly. Of course, all ADA requirements will be met for accessibility of Internet materials.

Another necessary piece of guidance for all archeological activities concerns the clarification of roles and responsibilities. Among the many potential participants in archeological projects, there are many who are not archeologists but are involved due to legal requirements or interest. Project managers, tribes, state and local governments, and private landowners often play important roles and are subject to a profusion of information. Therefore, it is important that roles and responsibilities are clear and that relationships between national programs (particularly as represented by programmatic agreements) and local practice are clearly described.

One piece of new guidance for archeological evaluation concerns evaluation methodology, which is how to evaluate an archeological property to determine proper treatment. Such evaluation is often quite different from that required to demonstrate eligibility under the National Register criteria. We will produce at least one technical brief or other publication related to this need which will address the use of non-invasive techniques for site assessment.

Most of the needed new guidance is for archeological treatment. A major need for broad guidance is to write Secretary of the Interior Standards for Archeological Preservation Projects. The field also needs guidance on systematic site condition assessments and strategies for site monitoring.

With regard to curation and information management, the working group discussed several important topics such as:

- improvement of accessibility to existing collections;
- improvement of standards for the care of collections;
- the need for new repositories to handle the constant influx of collections due to federal, state, and tribal legislation;
- rapidity with which hardware and software for managing data become obsolete;
- the need for careful archiving of digital data;
- the need for careful management of site data and curation data; and
- the need for training on archeological curation for professional archeologists.

One of the related sub-goals is the updating of the Curation Standards (36 C.F.R. Part 79). Although for the most part the current guidelines are adequate, they need some revision concerning deaccessioning issues and digital format for associated records. There also should be general technical information on topical headings of the curation regulations, including development of repositories and relationship of museum collections and the Native American Graves Protection and Repatriation Act.

In addition, up-to-date assistance is required for effective information management. We are considering the development of a technical brief on data automation (dbase and GIS) and a technical brief on the digital archiving of archeological documentation.

What Has Been Accomplished with Guidance Project?

There are several key materials now available on-line.

- There is a new National Register bulletin on the evaluation and registration of archeological properties. This bulletin incorporates the draft guidance on the Determination of Eligibility (DOE) process that had been developed by the Advisory Council on Historic Preservation and the NPS in response to criticisms of the Consensus DOE process. The National Register bulletin, *Guidelines for Evaluating and Registering Archeological Resources*, is available through the National Register and over the Internet at <www.cr.nps.gov/nr/publications>.
- An annotated version with updated references of the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* is now available over the Internet at <www.cr.nps.gov/linklaws.htm>. This is an important addition to the other relevant legislation, regulation, and guidance posted on the National Center for Cultural Resources web sites.
- There is now online technical assistance on archeological curation developed by the Archeology and Ethnography Program. This useful site may be found at <www.cr.nps.gov/aad/collections/index.htm>.
- All *Archeological Assistance Technical Briefs* are available on the Archeology and Ethnography web site at <www.cr.nps.gov/aad/aepubs.htm#briefs1>. Several topics related to the treatment of archeological resources such as site stabilization, collections management, and public outreach are included among the topics in this series.

What Will Be the Results?

If we make the assumption that improving guidance and making it accessible will result in its wide use, then meeting these goals will impact the preservation of cultural resources nationwide in the following ways:

- Increase technical competence and professionalism in identifying, evaluating, and treating archeological properties.
- Increase the consistency within state, tribal, and federal agencies across the country in identification, evaluation, and treatment of archeological properties.

- Reinforce in geographically separate SHPOs, parks, and other agencies, a sense of working together on a national program.
- Increase the number of archeological listings in the National Register of Historic Places and designated National Historic Landmarks.

“Back to Basics” leads us to the essential philosophy behind good guidance. That philosophy includes a belief in the public benefit of archeology. Public benefits must support our work in cultural resource management, as cultural resources enhance our quality of life now and in the future.

The CR 2000 Conference theme of Innovations prompts me to consider that principles of guidance change as wider cultural values change and as professional practices change. We find ourselves with a dearth of adequate guidance in the treatment of archeological resources because the whole idea about what is appropriate treatment has shifted from data recovery to preservation in place. At one time, the only value connected with archeological sites was that of information, and that is how the National Register criteria were written over 30 years ago. Now the broader values of sites, long recognized by descendant groups, are affecting treatments.

Finally, the theme of Education and Awareness leads me to my vision for this project and for the role of guidance for archeological practice. We tend to think of guidance as a bureaucratic instrument, but it can also be an educational tool for public archeology. Current guidance is not reaching the people who need it—not just archeologists but also land managers, project managers, and the affected public. Making the information accessible in a format that is linked to good information on the public benefit of archeology will raise awareness both of best practices and the reasons we want to follow them.

My personal vision is ultimately to see compliance transformed into commitment. From my point of view, that means that two major things will become true.

Within federal, state, tribal, and local governments, the protection and preservation of cultural resources will be based on commitment to

principles of stewardship rather than solely legal requirements.

Members of the public will appreciate cultural resources as providing perspective on the human community in the past, present, and future. Archeology and ethnography will be a valued part of the curriculum developed for educating the global citizen.

For help in thinking about commitment, I turned to a recent book by Peter Senge and his colleagues, *The Dance of Change*. They write, “Deep changes—in how people think, what they believe, how they see the world—are difficult, if not impossible, to achieve through compliance.”³

Considering that insight, I would like to see attitudes toward the preservation of cultural resources flip a famous marketing campaign on its head. We’ve all heard the effective sound bite: “It’s not just a good idea, it’s the law.” Let’s work for commitment instead of compliance so that the everyday expression is, “It’s not just the law, it’s a good idea.”

Notes

- ¹ William Lipe, President, Society for American Archeology, “Report from the Task Force on Renewing our National Archeology Program,” 1997.
- ² Bill Lipe and Chuck Redman, “Conference on ‘Renewing Our National Archeological Program,’” www.anth.ucsb.edu/projects/saa/14.4/SAA12.html.
- ³ Peter M. Senge et al. *The Dance of Change: The Challenges of Sustaining Momentum in Learning Organizations*. (New York: Currency/Doubleday, 1999), 13.

Barbara J. Little is an archeologist with the Archeology and Ethnography Program, National Center for Cultural Resources, National Park Service, Washington, DC.

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